

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 17-CR-093-GKF
)	
BALEY LYNN ENLOE, a/k/a “Bailey Enloe”, et al.)	
)	
Defendants.)	

DEFENDANT’S MOTION TO CONTINUE SENTENCING DATE

COMES NOW the Defendant, Baley Lynn Enloe, (hereafter, the “Defendant”) by and through her attorney, Matthew P. Cyran, and respectfully requests that the Court continue the currently scheduled sentencing date from April 5, 2018, until at least April 23, 2018, or later, as prayed for below. In support of such request, Defendant states as follows:

1. Counsel for the Defendant has discussed this Motion with counsel for the Government and can represent to the Court that the Government has no objection to the requested relief.
2. The sentencing hearing in this matter is currently scheduled for April 5, 2018, at 10:30 a.m.
3. Counsel for the Defendant has been contacted by Tulsa County Assistant District Attorney, Tara Britt (“Ms. Britt”) and been informed that the Defendant is a victim and material witness in Tulsa County District Court Case No. CF-2017-2910, *State of Oklahoma v. David Soi* (the “State Action”).

4. Ms. Britt has informed counsel for the Defendant that the State Action is currently scheduled to begin a jury trial before Tulsa County District Judge, Kelly Greenough on April 19, 2018. Ms. Britt anticipates that the Defendant's testimony will be necessary on April 20, 2018.

5. The Defendant requests that the Court strike the currently scheduled sentencing hearing and re-schedule it to a date certain later than April 20, 2018. Given that April 20, 2018, is a Friday, the next available business day is Monday, April 23, 2018.

6. Pursuant to LCrR. 47.3, a proposed Order is submitted contemporaneously with the filing of this Motion.

WHEREFORE, premises considered, the Defendant requests the Court grant the above requested relief.

Respectfully submitted,

s/Matthew P. Cyran

Matthew P. Cyran, OBA No. 16918
ROSENSTEIN, FIST & RINGOLD
525 South Main, Suite 700
Tulsa, Oklahoma 74103
(918) 585-9211 Telephone
(918) 583-5617 Facsimile
mcyran@rfrlaw.com

ATTORNEY FOR THE DEFENDANT,
BALEY LYNN ENLOE

CERTIFICATE OF DELIVERY

☒ I hereby certify that on this 26th day of March, 2018, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Ms. Joel-lyn McCormick
Assistant United States Attorney
110 West Seventh Street
Tulsa, Oklahoma 74103

s/Matthew P. Cyran

MATTHEW P. CYRAN